

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

MARY FANCES SAVINE-DIAMANTIS

Chapter 13

Debtor

Bankruptcy No. 17-14930-AMC

**OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTOR(S)**

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan fails to provide that all of the projected disposable income of debtor(s), who has/have current monthly income which is above median, will be applied to make payments to unsecured creditors under the Plan, in violation of 11 U.S.C. Section 1325 (b)(3).

The Plan violates 11 U.S.C. Section 1325(b)(2) in that it does not include all disposable income for the benefit of the unsecured creditors, and in particular, debtor(s) has/have failed to include the amounts that will be available once all pension loans have been paid.

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller
William C. Miller, Esquire
Chapter 13 Standing Trustee